

ICC Docket No. 01-0662  
Ameritech Illinois Ex. 4.1 (Cottrell)  
Schedule – 2/Part 3  
\*\*\*PUBLIC\*\*\*



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January 29, 2002

Dorothy Wideman  
Executive Secretary  
Michigan Public Service Commission  
6545 Mercantile Way  
Lansing, MI 48909

JOHN M. DEMPSEY  
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**Via Hand Delivery**

**Re: In the matter, on the Commission's own motion, to consider  
AMERITECH MICHIGAN'S compliance with the competitive checklist  
in Section 271 of the federal Telecommunications Act of 1996.  
Case No. U-12320**

Dear Ms. Wideman:

Please find enclosed for filing an original and 15 copies of *Ameritech Michigan's Supplemental Report on the Line Loss Notification Issue* and *Proof of Service*.

Please note that the confidential materials enclosed should be filed under separate seal, and that this documentation constitutes trade secrets and commercial or financial information which cannot be disclosed to unauthorized persons without the consent of Ameritech pursuant to Section 210 of the 1991 P.A. 179, as amended by 1995 P.A. 216.

Further, as to the confidential exhibit, Ameritech Michigan will provide, upon request, information relating to each individual CLEC as shown on Confidential Attachment A.

If you should have any questions, please contact me. Thank you.

Very truly yours,

John M. Dempsey

JMD/mds  
Enclosures

C o u n s e l l o r s   A t   L a w

DETROIT   BLOOMFIELD HILLS   LANSING   GRAND RAPIDS   ANN ARBOR  
WASHINGTON, D.C.

STATE OF MICHIGAN

BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

In the matter, on the Commission's own motion,       )  
to consider Ameritech Michigan's compliance       )  
with the competitive checklist in Section 271 of       ) Case No. U-12320  
the federal Telecommunications Act of 1996.       )  
\_\_\_\_\_)

PROOF OF SERVICE

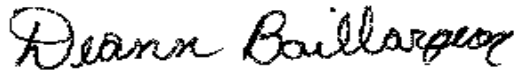
STATE OF MICHIGAN       )  
  ) ss.  
COUNTY OF INGHAM       )

Mindy D. Smith, being first duly sworn, deposes and says she is employed at Dickinson Wright PLLC; and that on January 29, 2002, she served a copy of ***Ameritech Michigan's Supplemental Report on the Line Loss Notification Issue*** upon the attached service list via email and first class mail by depositing the same in a United States postal depository, enclosed in an envelope, bearing postage fully prepaid in Lansing, Michigan.



\_\_\_\_\_  
Mindy D. Smith

Subscribed and sworn to before me,  
a Notary Public in and for said County,  
this 29th day of January, 2002.



\_\_\_\_\_  
Deann Baillargeon, Notary Public  
Ingham County, Michigan  
My Commission Expires: 2/16/03

**SERVICE LIST – MPSC CASE NO. U-12320**

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**STATE OF MICHIGAN**  
**BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION**

In the matter, on the Commission's own motion,	)	
to consider Ameritech Michigan's compliance	)	
with the competitive checklist in Section 271 of	)	Case No. U-12320
the federal Telecommunications Act of 1996.	)	
_____	)	

**AMERITECH MICHIGAN'S SUPPLEMENTAL REPORT**  
**ON THE LINE LOSS NOTIFICATION ISSUE**

Ameritech Michigan<sup>1</sup> submits the following supplemental report on line loss notifications, in accordance with its commitment made in the interim report filed in this docket on January 9, 2002.<sup>2</sup>

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<sup>1</sup> Michigan Bell Telephone Company d/b/a Ameritech Michigan, a Michigan corporation, is a wholly owned subsidiary of Ameritech Corporation, which owns the former Bell operating companies in the states of Michigan, Illinois, Wisconsin, Indiana, and Ohio. Ameritech Corporation is a wholly owned subsidiary of SBC Communications, Inc. Michigan Bell offers telecommunications services and operates under the names "Ameritech" and "Ameritech Michigan" (used interchangeably herein) pursuant to assumed name filings with the state of Michigan.

<sup>2</sup> The interim report was required by the Commission's December 20, 2001 Opinion and Order ("Order") in this docket. The Order required Ameritech Michigan to file "a comprehensive report" that would include the following information: (1) the success of Ameritech Michigan's efforts to date to resolve the issue; (2) the numbers of affected customers; (3) timeframes in which CLECs may expect notification; and (4) confirmation that Ameritech Michigan has provided notice to affected customers explaining that any dual billing is not the fault of the CLEC. Ameritech Michigan had previously filed a response on December 14, 2001 to a filing made on the issue by WorldCom.

## **I. INTRODUCTION**

As stated in its previous filings on this issue, Ameritech Michigan has undertaken an extensive and ongoing investigation of the issue of missing line loss notifications since it first received current information about the issue at the end of September and early October 2001. As the sources of the missing information have become known, Ameritech Michigan has proceeded to define and implement solutions. A detailed description of the efforts undertaken to date and the results of same are contained in the two prior filings. The purpose of this supplemental filing is to provide the Commission and the parties to this docket with further information regarding the current status of Ameritech's continuing investigation into this issue, as well as to provide an update as to the actions Ameritech Michigan stated it would take in its January 9, 2002 filing. Ameritech Michigan takes this matter very seriously and will continue to concentrate efforts on solving the line loss notification issues. Accordingly, it will continue to provide updated information to the Commission and the CLECs on the issue until all identified problems have been addressed. The next update will be provided no later than February 28, 2002.

## **II. UPDATE ON ACTIONS DESCRIBED IN JANUARY 9, 2002 FILING**

The assigned account manager notified each of the affected CLECs by January 25, 2002, by a variety of methods, including: E-mail, Fax, Overnight Mail, and U.S. Mail. The delivery method was selected by the account manager. Attachment A to this report, which is being filed under separate cover due to its proprietary nature, lists the date of notification and

delivery method of each affected CLEC.<sup>3</sup> Attachment B to this report contains a typical letter that was used to notify the affected CLECs. Each letter was accompanied with a letter the CLEC could use with their end users to explain that any double billing encountered was due to Ameritech Michigan not properly generating the line loss notifiers. (A copy of this letter was included as Attachment B to Ameritech Michigan's January 9 Report.)

So that each CLEC has adequate time to prepare to receive the line loss notifiers, the identified missing line loss notifiers will be electronically generated to each CLEC via normal OSS channels during the weekend of February 2-3, 2002. In the event that any notifiers fall out and cannot be properly generated, those notifiers will be addressed during the week of February 4.

The telephone numbers of end users who returned to Ameritech Michigan for local service that were associated with the identified missing line loss notifiers were identified to Ameritech's retail billing systems in order to generate bill page messages notifying those end users that any double billing encountered was due to Ameritech Michigan not properly generating the line loss notifiers. The bill page message will run during the month of February.

Ameritech will further update this information, including any update of the numbers of the affected end users, in its next report.

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<sup>3</sup> After the January 9, 2002 filing, it was determined that one CLEC did not need to be notified as it was determined that the missing line loss notifiers related to test accounts by the account manager.

### **III. TO-DATE RESULTS OF CROSS-FUNCTIONAL INVESTIGATION**

As discussed in the January 9 Report, a cross-functional team was formed to do a comprehensive review of the line loss notification process. The team was charged with reviewing current processes and systems and to identify other scenarios that have or may affect the proper generation of line loss notifications (known as "836s") to the "losing" CLEC. In addition to the two M&P issues identified previously, the following scenarios have been identified. While the team has identified the scenarios, it has not yet been able to verify (and quantify where technically feasible) the extent that these scenarios have actually occurred.

#### **A. Accuracy of data in CLEC User Profile in MOR/Tel.**

The CLEC User Profile is populated in Ameritech's Mechanized Order Receipt / Telemanagement ("MOR/Tel") system based on data provided by each CLEC via a questionnaire. The user profile contains separate fields for different types of notifiers that the CLEC may receive so as to allow the CLEC to determine which part of their organization is best suited to receive the various types of notifiers. There is a separate field to populate for line loss notifiers. The CLEC is solely responsible for providing accurate and complete information to Ameritech Michigan in the completion of their questionnaire, including any updates that may be required over time. The standard form and an instruction document are found on CLEC OnLine, under "Getting Started". The completed questionnaire is to be sent by the CLEC to its account manager for processing.

Most recently, accessible letter CLECALL02-005 was issued (dated January 11, 2002; Attachment C hereto) reminding CLECs of the need to ensure their 13-state user profile is properly updated. In particular, the accessible letter lists the default action for line loss notifications if CLECs do not populate the required field; that is, no line loss notification will be generated. However, even prior to implementation of LSOG 5 (which the accessible letter references), the field for line loss notification must be populated in order for MOR/Tel to know where this type of notifier must be sent. It appears, upon review of the cross-functional team, that there may be missing or out-of-date information in CLEC user profiles for this field.

To ensure that the CLEC user profiles stored in MOR/Tel have been properly populated pursuant to a CLEC's completed questionnaire, Ameritech Michigan will undertake an audit that will compare the data contained on the CLEC questionnaire to that stored in the CLEC's user profile. If any discrepancy is found, it will be resolved with the CLEC via its account manager to ensure that accurate information is contained in the CLEC user profile. The timeframe necessary to conduct this audit is currently under determination as the effort will be manual and thus labor intensive; however, the audit will be handled as expeditiously as possible.

## **B. Partial Migrations**

A partial migration occurs when an end user migrates only some of their lines to a different provider. For example, the end user has a 10 line account with CLEC A and decides to transfer three of their lines to CLEC B. Orders must then be issued to update CLEC A's account to reflect that three lines were lost and to establish CLEC B's account for those three lines. Depending on how the order flowed through Ameritech, different order scenarios may be employed.

The cross-functional team identified that, when using the example noted above, the Local Service Center (LSC) issues a Change (or “C”) Order to update CLEC A’s account to reflect that it now has 7 lines and also issues a New (or “N”) Order to establish CLEC B’s account with the three lines the end user decided to move. The team determined that the “C Order” may not contain all of the necessary “losing” information that would allow MOR/Tel to identify the need for, and generate, a line loss notification (an “836”) to the losing CLEC using its current logic, i.e., the “losing” information. An Identified Problem (“IP”) has been issued (#52268) to update the system logic so that it can detect the situation of a partial migration effectuated with this order scenario. The new system logic will look to compare if the owner of the account (CLEC A) is the same as the submitter of the order (CLEC B) and determine if a line loss notification is required. This system update will be implemented during the February 2-3, 2002 weekend. It is important to note that no CLEC notification via accessible letter is necessary to effectuate this change since it will not impact how CLECs submit or receive information from Ameritech’s systems.

A second ordering scenario was also identified that may occur with partial migrations. This scenario is most likely to occur on “Auto/Auto” orders, where the orders flow through Ameritech’s systems and do not require any input or intervention from the LSC. In this ordering scenario, three orders are issued to effectuate the change. Using the example above, the following orders would be issued: a Disconnect (or “D”) Order would be issued to take out the 10-line account for CLEC A; a “N Order would be issued to re-establish the 7-line account for CLEC A; and, an “N order” would be issued to establish the 3-line account for CLEC B.

The team determined that under this scenario a line loss notification would be issued to CLEC A, however, it would indicate that all 10 lines were lost. Further, because CLEC

A's D Order and related N Order result from a requesting purchase order of CLEC B, no Firm Order Confirmation ("FOC"), Service Order Completion ("SOC"), or other notifier is issued to CLEC A to reflect the reestablishment of the 7 line account for CLEC A. In this situation, a line loss notifier is generated, but it may not accurately reflect the number of lines lost.

Before making more wide-scale system changes, the team determined that this ordering scenario required further examination to ensure that the processes defined are the most appropriate and efficient to effectuate the change that is desired. Thus, a sub-team has been formed to examine this scenario to determine: the proper process; the systems requirements for that process; and, the needed changes to systems, internal documentation (including methods and procedures), and external documentation (used by CLECs) to ensure the requirements are properly implemented. Because changes of this type may affect CLECs directly (in how information is conveyed to or received from Ameritech), the team also needs to assess any Change Management requirements that may be applicable. This microscopic review has commenced and will be reported on in Ameritech Michigan's next update report.

### **C. Issue 7 UNE-P Migrations**

Pursuant to agreements reached in the Uniform and Enhanced Plan of Record ("POR") collaboratives conducted under the SBC/Ameritech merger requirements, Ameritech maintains two versions of its Electronic Data Interchange ("EDI") Operations Support Systems (OSS) so that CLECs may choose how they evolve their systems to accommodate changes in industry standards and how those are implemented in Ameritech's systems. Today, both "Issue 7" and "LSOG 4" versions of Ameritech's EDI systems are available for CLECs to use.

The cross-functional team has identified an issue with Issue 7 in the processing of UNE-P to UNE-P migrations. In this ordering scenario, multiple service orders are used to effectuate the required change. That is, a “D Order” (full migration) or a “C Order” (partial migration) is issued to remove the line(s) from CLEC A’s account and an “N Order” is issued to establish the line(s) on CLEC B’s account. The order number of the order that first processed through Ameritech’s systems to MOR/Tel (i.e., did the “C Order” complete first or the “N Order”?) is the one that was used to populate the service order number on the line loss notifier. Thus, if the “N Order” completed first, the losing CLEC (CLEC A) would receive a line loss notifier populated with an N order number, which may seem incongruous to CLEC A.<sup>4</sup> CLEC A would be expecting a “D” (Disconnect) Order, or possibly a “C” (Change) Order on a line loss notifier. However, and importantly, the team determined that the telephone numbers included on the line loss notifiers were correct.

This scenario does not impact LSOG 4 systems, nor will it affect LSOG 5 systems when deployed, since current requirements do not have the order number populated on the line loss notification (or “836”). Because Issue 7 is close to being retired and because the telephone numbers reported on the line loss notifiers sent are correct, it was determined that it would not be an efficient use of resources to update the systems that would not be used in a relatively short timeframe. As CLECs have been notified, Issue 7 will no longer be available to accept new orders after March 9, 2002, the date that LSOG 5 is scheduled to be deployed. Further, should a CLEC desire an investigation on a particular line loss notification to determine the appropriate service order number, it may contact its account manager or the LSC.

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<sup>4</sup> CLEC A would know it was a “New” or “N Order” because the order number begins with the letter “N”.



#### **D. Cross-Functional Team Continuing Actions**

The cross-functional team effort is continuing and will remain in place until the issue of proper generation of line loss notifiers is resolved. Identification of any missing line loss notifiers for these scenarios, including feasibility of such identification, is still under investigation and determination. Additionally, the team is considering the potential impact of more than one of these scenarios impacting a particular CLEC order.

The cross-functional team will also use any feedback provided by CLECs to help provide a determination of the impact of the above identified scenarios, as well as to have additional information on whether there are yet additional scenarios to address.

An update of further findings and determination will be made to the Commission on or before February 28, 2002.

#### **IV. RESPONSES TO WORLDCOM AND Z-TEL JANUARY 24 SUBMISSIONS**

Both Worldcom and Z-Tel responded to Ameritech Michigan's January 9, 2002 Report, regarding Ameritech's efforts with regards to line loss notifiers. As all of Ameritech Michigan reports, including this one, clearly demonstrate, Ameritech Michigan is working on all issues related to this matter in order that no CLEC will be adversely affected. Ameritech Michigan will carefully review their filed comments and provide a response on February 8, 2002 (15 days from January 24, 2002) to the extent possible, providing any additional information in the supplemental report to be filed by February 28, 2001.

However, one issue related to customer notification raised by WorldCom merits an immediate response. WorldCom expresses opposition to Ameritech Michigan's issuance of a letter to its own customers who may have experienced a line loss notification problem, arguing it takes time away from solving the problem itself. Clearly, however, such a communication was required by the Commission's December 20, 2001 Order and is appropriate since it clarifies for the Ameritech Michigan customer that any prior double billing problem was not a CLEC problem, thus removing any potential for that incident to disincite the customer from switching to a CLEC in the future. Furthermore, issuing what is actually a bill page message is completely separate from, and does not in any way detract from, the ongoing efforts to diagnose and correct line loss notification failures.

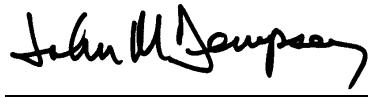
## **V. CONCLUSION**

As previously stated, Ameritech Michigan is working with the Commission and CLECs and is committed to resolve these line loss notification issues. Ameritech Michigan continues to take this issue very seriously and will continue to concentrate efforts on solving the issue. It will continue to provide updated information to the Commission and CLECs on the issue regarding its continuing efforts to completely rectify any identified problems. The next update will be provided no later than February 28, 2002.

Respectfully Submitted,

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Dated: January 29, 2002

LANSING 34060-104 292284

**ATTACHMENT A**

**CONFIDENTIAL**

**Subject to Protective Order  
in Case No. U-12320**



RE: Line Loss Notification (836s)

Dear << contact>>:

As a result of a Michigan Public Service Commission Order (U-12320) dated 12/20/01, we are notifying you that process issues in SBC Ameritech Michigan have hampered some local service providers from receiving timely notice of an end user's decision to change to another provider. We would like to apologize for any inconvenience you may have experienced regarding non-generation of Line Loss Notifications (836s) which may have resulted in double billing of the CLEC's end user after the end user migrated local service to another Competitive Local Exchange Provider (CLEC) or to Ameritech-Michigan in a Winback situation.

SBC Ameritech Michigan has identified two root causes for this situation and is taking necessary corrective action. As a result of a cross-functional team review, <<clec name>> has been identified as one of Ameritech-Michigan's customers experiencing missing line loss notifications. Attached for your use is a spreadsheet outlining your accounts where a line loss notification was not produced. Between January 16 and February 8, notification of line loss on each of these accounts will be sent to <<clec name>> through established OSS channels.

In addition, Ameritech-Michigan is very aware that lack of line loss notice may have caused LDMI to continue billing affected end-users. For those particular end-users now served by Ameritech-Michigan a notice will be sent advising them that any double billing was not the fault of <<clec name>>. A similar letter is attached for your use in notifying those end-users affected by a CLEC to CLEC migration.

We also understand this issue may have affected similar activity in the other four Ameritech states (Ohio, Illinois, Indiana and Wisconsin). Please be advised that we will be taking similar action to identify missing line loss notifiers for those states and will notify you of our results and planned timeframe to transmit those line loss notifiers as soon as that information is available.

If you have any questions, please do not hesitate to call me at <<acct mgr TN>>.

Sincerely,



## Accessible

SBC Ameritech  
Bell

SBC Nevada Bell

SBC Pacific Bell

SBC SNET

SBC Southwestern

Date: **January 11, 2002**

Number: **CLECALL02-005**

Effective Date: **In conjunction with the POR OSS releases**

Category: **All**

Subject: **(BUSINESS PROCESSES) CLEC Profile – Default Values**

Related Letters: **CLECALL01-029**

Attachment: **NA**

States Impacted: **All States**

Response Deadline: **NA**

Contact: **Account Manager**

Conference Call/Meeting: **NA**

This Accessible Letter provides information concerning default values assigned by SBC in the event an updated 13-state CLEC Profile is not received by SBC from a CLEC company. Accessible Letter **CLECALL01-029** SBC announced a new 13-state CLEC profile. Contained within the 13-state profile are required fields in support of the LSOR 05.00 OSS releases. As a result, there are certain fields on the profile forms that are now **required** entries. In the event CLEC profiles are not received by SBC prior to the LSOR 05.00 OSS releases, certain field values will be defaulted. The table below identifies the Fields and the default values associated with each field.

Page	Field	Default value if not populated
2	Advance Services Provisioning	No
8	Lite Address Validation	No Lite Address will be performed
8	Loss Notification	Loss Notifications will not be sent to the losing CLEC
8	Order Status	Users will be able to view both Service Order List and Service Order detail.
9	Manual Loop Qualification	E-mail notifications of MLR completion will not be sent
10	Dial Tone Testing	SBC will not perform dial-tone testing on due date minus 2 days.

The default values will be effective with the implementation of the LSOR 5.0 Plan of Record releases. Instructions on how to fill out the CLEC profile forms can be accessed from the CLEC Online web site at <https://clec.sbc.com> using the following steps:

- The user will need to select GETTING STARTED AS A CLEC
- Click on the FORMS link
- Select CLEC PROFILE 13-STATE INSTRUCTIONS

**CLEC SPECIFIC LINE LOSS INFORMATION IS PROPRIETARY  
AND ONLY AVAILABLE IN THE  
CONFIDENTIAL VERSION OF THIS SCHEDULE**